

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE COMMISSION'S)
JURISDICTION OVER ELECTRIC VEHICLE)
CHARGING STATIONS AND SERVICE) PSC DOCKET NO. 19-0377
PROVIDERS)
(FILED JUNE 11, 2019))
)

**PETITION OF THE NATURAL RESOURCES
DEFENSE COUNCIL FOR LEAVE TO INTERVENE**

The Natural Resources Defense Council ("NRDC"), pursuant to Delaware Public Service Commission (the "Commission") Rules of Practice and Procedure 2.9 (26 *Del. Admin. C.* §1001-2.9), and PSC Order No. 9418, hereby petitions the Commission for leave to intervene as a party in this matter.

In support of its petition for leave to intervene, NRDC states the following:

1. Pursuant to Commission Rules of Practice and Procedure 2.9.1.1 (26 *Del. Admin. C.* § 1001-2.9.1.1), NRDC's contact information is as follows:

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2. Founded in 1970, NRDC is a non-profit organization dedicated to protecting public health and the environment. On behalf of its 1.3 million members and activists nationwide, NRDC has been deeply involved in state and federal forums to reduce emissions from both the transportation and electric sectors. NRDC's experience and policy expertise in both sectors informs its work advocating for the electrification of the transportation sector. NRDC has published comprehensive analyses on the air quality and greenhouse gas emission benefits associated with electric vehicles, as well as articles and reports on utility policies related to transportation electrification.
3. NRDC's interests are distinct from and not adequately represented by the other parties or intervenors in this docket. NRDC brings a unique perspective and expertise given its broad experience across the nation in state utility regulations and deep expertise on utility vehicle electrification policies. Moreover, NRDC intends to work closely with other aligned parties to avoid any redundant filings or testimony.
4. NRDC's participation in this docket is in the public interest. NRDC has appeared before state public utility commissions and legislatures regarding public service commission jurisdiction over electric vehicle charging stations. NRDC has also written several reports and papers regarding the importance of model utility policies for vehicle electrification and removing barriers for a thriving plug-in vehicle market, which will improve air quality and public health.
5. NRDC is supportive of the commission's efforts to "investigate the appropriateness of forbearing from the supervision and regulation of EV charging station owners and operators," and is supportive of the Commission staff's petition for relief regarding the regulation of electric vehicle charging stations.

6. For the foregoing reasons, NRDC requests that it be made party to this proceeding for all purposes.

WHEREFORE, the Natural Resources Defense Council respectfully requests that the Commission allow it to intervene in this matter so that the Natural Resources Defense Council may participate with full rights as a party.

Respectfully submitted,

BAIRD MANDALAS BROCKSTEDT LLC

/s/ Daniel F. McAllister

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*Attorney for Natural Resources Defense
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Dated: July 16, 2019

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition to Intervene was sent via email July 16, 2019 to the following persons:

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